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November 10, 2003

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: **CC Docket 94-102**
Amendment of E-911 Phase II Implementation Plan

Sussex Cellular, Inc.
d/b/a SciTel Wireless
TRS # 818302

Dear Ms. Dortch:

On behalf of the above-referenced carrier, and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding the company's amended E-911 Phase 2 implementation plan.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,



David L. Nace

cc: Qualex International (w/enclosure on diskette)
Policy Division, Wireless Telecommunications Bureau, FCC (w/enclosure)

SUSSEX CELLULAR, INC.

WT Docket 94-102

Amended E-911 Phase II Implementation Plan Report

Background/Contact Information

(1) **Carrier Identifying Information**

Sussex Cellular, Inc.
d/b/a SciTel Wireless
TRS # 818302

(2) **Contact Information**

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E911 Phase II Location Technology Information

(1) **Type of Technology**

Sussex Cellular, Inc. ("Sussex Cellular") provides wireless services using AMPS technology to serve Sussex County, New Jersey. Sussex Cellular has concluded that the handset-based technology it previously selected is not as viable an option to meet its E911 Phase II obligations in its market as will be a network-based solution. Conversion to a digital air interface would be required to support a handset-based solution because there are no automatic location information ("ALI")-capable handsets available in the marketplace that are compatible with Petitioner's AMPS network. Digital conversion is not realistically foreseeable at this time. Sussex Cellular has therefore decided that a network-based technology will be the most practical means to make available Phase II services in its operating area. Because of the unavailability of analog handsets with Phase II ALI capabilities, Sussex Cellular can no longer pursue a pure handset-based approach to its Phase II implementation program.

For these reasons Sussex Cellular will be developing an alternative approach to Phase II implementation, aimed at employing a network-based solution in its licensed area. To that end Sussex Cellular has consulted with the two major suppliers of network-based E911 Phase II wireless location systems. Sussex Cellular will continue to receive and evaluate available products, particularly those offered by Andrew Corporation (formerly Grayson Wireless) and TruePosition, to obtain the necessary network hardware and software changes and/or upgrades to implement a network-based solution.

(2) Testing and Verification

Sussex Cellular has not itself conducted tests of Phase II technology. It will review and evaluate the test results and accompanying technical information provided by potential providers of equipment, services and software. Sussex Cellular will adopt its own testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing by company technicians once a network-based solution has been implemented.

(3) Implementation Details and Schedule

- In a separately filed petition, Sussex Cellular has requested and received from the Commission an extension of time to implement Phase II services, which was made available to other small and regional wireless carriers defined as “Tier III” carriers in the Commission’s *Order to Stay*, 17 FCC Rcd 14841, released July 26, 2002 (“Extension Order”). It is Sussex Cellular’s intention to deploy a network-based Phase II system in compliance with the deadlines applicable to Tier III carriers as set out in paragraph 32 of the Extension Order, and as subsequently decided by the Commission in accordance with the actions set forth in the Commission’s *Order To Stay*, CC Docket 94-102, FCC 03-241 (rel. October 10, 2003)
- Sussex Cellular will notify the FCC of any change in its schedule for implementation. Sussex Cellular recognizes that the Commission’s current rules require the deployment of a Phase II system, even if none exists which fully meets the Commission’s accuracy requirements.

(4) PSAP Interface

Sussex Cellular intends to work with the New Jersey Office of Information Technology to determine the best method of delivering Phase II information services. Sussex Cellular intends to deploy the necessary hardware and software changes to timely deliver the Phase II information in accordance with any valid Phase II request. Where appropriate, Sussex Cellular will work with the PSAP to convert the PSAP interface to non-call path associated signaling (“NCAS”) to accommodate

the increased messaging requirements resulting from implementation of E911 capabilities.

(5) Existing Handsets

It is anticipated that Sussex Cellular's network-based solution will create a Phase II capability that will provide enhanced ALI information from the commencement of implementation.

(6) Location of Non-Compatible Handsets

It is Sussex Cellular's intention to employ a network-based solution that will ensure that E911 calls coming from handsets that are incompatible with Sussex Cellular's technology solution will be delivered to the PSAP.

(7) Other Information

Sussex Cellular remains dedicated to implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree feasible and technically possible. While Sussex Cellular cannot control equipment availability or vendors' delivery schedules, and has yet to receive a valid Phase II PSAP request, it will work diligently to timely implement a network-based E911 Phase II solution for its in-place AMPS network.